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July 13, 1983

The draft Montana/Environmental Protection Agency Agreement (MEA) for FY84-85 is enclosed for your information. The MEA addresses environmental programs for the State of Montana. The narrative portion covers both fiscal years while the work plans address only FY84 with annual revision.

We will appreciate any view or comment on the material you wish to offer until August 15, 1983. Send your comments to:

Environmental Protection Agency
Federal Building
301 South Park, Drawer 10096
Helena, MT 59626

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MONTANA/ENVIRONMENTAL PROTECTION AGENCY

AGREEMENT

Agreement on the Management and Administration of Montana's Environmental Programs for Federal Fiscal Years 1984 and 1985

September 1983

DRAFT

Approved:

The undersigned hereby execute this Agreement on the Management and Administration of Montana's Fiscal Year 1984 Water Pollution Control, Safe Drinking Water, Air Quality, Solid and Hazardous Waste Management, Superfund, Pesticides, and Toxics.

State of Montana

Ted Schwinden
Governor State of Montana

Date

John J. Drynan, M.D., Director
Department of Health and
Environmental Sciences

Date

Keith C. Kelly, Director
Department of Agriculture

Date

Environmental Protection Agency

Regional Administrator

Date

Montana Office

Date

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INTRODUCTION

A primary goal of Montana's environmental health programs is to protect public health while sustaining a spirit of cooperation between environmental protection and resource development. Accomplishing this requires close coordination between the Departments of Health and Environmental Sciences (DHES) and Agriculture (DOA) for the state, and the federal government's Environmental Protection Agency (EPA).

Through grants, research, monitoring, technical expertise and other areas of cooperation, the DHES, DOA and EPA are helping Montanans maintain their quality of life. The Montana/EPA Agreement (MEA) contributes to this process by consolidating all applications and narratives into one document, thus reducing paperwork and duplication of effort.

The MEA programs are comprised of DOA's pesticide program, DHES's air, water and solid waste management programs, and EPA's toxics and underground injection control programs.

The elements of the MEA include: (1) An overview of the state's environment, (2) identification of objectives, (3) strategies to accomplish priorities and (4) detailed work plans, activities and commitments.

The preparation of this MEA is a departure from the traditional annual approach in that it is principally a biennial agreement. The text portion of the document will cover fiscal years (FY) 1984 and 1985, while the media work plans will continue to be prepared and approved each fiscal year.

PROGRAM ENVIRONMENTAL SUMMARIES

The environmental problems in the state of Montana are as diverse as its geography. For this reason the precise definition of problems is evolutionary. As more resources and expertise become available, the more thorough problem definition becomes.

Presently most physical and chemical surface water quality conditions are known throughout the state. The first phase of comprehensive biological monitoring has been completed, with second phase sampling having begun in FY 1983. Lake classification work under an EPA Section 314 Grant is in its final phase. Fisheries classification work has been recently completed by the Department of Fish, Wildlife and Parks (DFWP). The inventorying of drinking water supplies has been a continuing effort, with the majority of supplies investigated during 1978-79.

In Montana, as throughout the United States, a major emphasis is being placed on the proper management of hazardous wastes. During FY 1984-85, a comprehensive investigation will continue to determine the extent of the hazardous waste problem and to establish the mechanism to properly deal with that problem. Throughout the next two years, the extent of the solid waste problems will continue to be evaluated through such means as field evaluations and system compatibility with the state plan.

The recent endrin controversy in Montana has resulted in a greater awareness and concern by the public of pesticides and pesticide applicators. During FY 1984 and 1985 emphasis will be placed on improved educational training for pesticide applicators and informational types of programs on pesticides for the general public. Emphasis will also be placed on the resolution of special pesticide enforcement problems, including the drift of pesticides and the disposal of pesticides and pesticide containers.

Air quality problems related to sulfur dioxide (SO_2) have been resolved for East Helena and are nearing completion for Billings during FY 1983. A request for designation of attainment for East Helena is forthcoming.

Total suspended particulate (TSP) problems have been located. Missoula will require implementation of control strategies for TSP. Butte, East Helena, Columbia Falls, Colstrip and Billings will continue to implement TSP control strategies in FY 1983.

Carbon monoxide (CO) problems exist in at least three major cities (Billings, Great Falls and Missoula). In order to determine the extent of the CO problem, additional data must be collected and modeling performed in Missoula. Great Falls and Billings are expected to attain the standards within the next two years.

The extent of lead concentrations in East Helena was well defined in FY 1982. Control strategies will be defined and implemented in FY 1983. New source air quality impacts related to energy production and mining are undergoing monitoring and evaluation to prevent significant deterioration.

Summaries of individual program area activities follow:

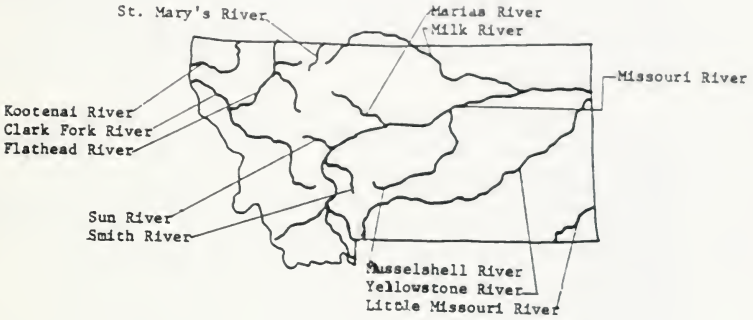
Water

Planning, Monitoring and Management

From parched plains to snow-capped peaks, there is no typical Montana water. The warm, sometimes salty and silt-laden prairie stream is as much a feature of Montana's natural resource inventory as the crystalline and icy mountain cascade. Superimposed over this broad spectrum of water quality are the activities and effluents of a largely rural Twentieth Century American society.

Historically, the state's efforts to curb pollution have centered on end-of-the-pipe or process control. Great strides have been made in recent years to the cleanup of municipal and industrial discharges. Much of this progress is attributable to a fair but enforceable set of water quality standards, permits issued under the Montana Pollutant Discharge Elimination System (MPDES), federally-subsidized Construction Grants Program for wastewater treatment plants and an improving atmosphere of cooperation between water users and regulatory agencies. Less than 10 percent of the stream miles degraded by point sources in 1960 are degraded today. Virtually all of the remaining point-source water quality problems in Montana have been identified and plans are being made for their eventual elimination.

Figure 1. Major Streams and Basins



Our knowledge of nonpoint-source pollution, embryonic before passage of the 1972 Federal Water Pollution Control Act Amendments, is finally coming of age. With the wholesale shift in program emphasis identified in Section 208 and later in Section 205(j) and the accompanying injection of federal funds, knowledge of nonpoint pollution in Montana is now on a par with knowledge of point-source pollution. Thanks to a battery of water quality assessments performed by scores of conservation districts, areawide organizations, Indian tribes and state and federal agencies, the massive nonpoint pollution picture is at last coming into focus.

Early in 1982 the Water Quality Bureau (WQB) first attempted a rigorous and systematic ranking of apparent and potential problem stream segments in Montana. Using all of the water quality data since 1975, much of it produced during the course of the 208 program, WQB identified 216 apparent and potential problem stream segments. Of these, 99 segments had water quality data in EPA's storage-retrieval system (STORET) and therefore could be ranked numerically and objectively. The remaining segments without data in STORET were sampled in 1983 in order to fill the gaps.

Data from representative stations on these segments were sent to Denver, where EPA's Region VIII office performed a computerized severity analysis for each segment. The analysis produced a severity index that was based on the degree and frequency by which water quality criteria were exceeded for a total of five beneficial uses.

Two-thirds of the 99 segments with data either had a severity index of zero, meaning "no problem," or their problems were determined to be largely natural in origin and therefore not remediable under existing pollution control programs. About one-third or 32 of the 99 segments with data had non-zero severity indexes and had problems that are largely man-caused and remediable under existing regulatory authority and pollution control programs.

Montana's "Big Three" water quality problems are dewatering, sediment and salinity. Soil and water conservation districts have identified 873 miles of dewatered streams in Montana. The infamous Muddy Creek of the Sun River is Montana's showcase sediment problem, but there are scores of others. Saline seep and its effects are common knowledge among water professionals in the state and, like dewatering and sediment, they need no further elaboration.

Ambient, fixed-station water quality monitoring in Montana is performed primarily by the Water Resources Division of the U.S. Geological Survey (USGS), which does contract monitoring for a number of state and federal agencies. The current USGS water quality monitoring network numbers about 75 stations statewide. Stations are being eliminated and sampling frequencies are being reduced because of deep cuts in many agency monitoring budgets. The WQB has adopted seven of the USGS NASQAN (National Stream Quality Accounting Network) stations as the core of its own fixed-station monitoring program. The WQB performs its own monthly monitoring on the Clark Fork River at Warm Springs, Deer Lodge and Garrison. The upper Clark Fork River has experienced a tremendous improvement in water quality over the past 15 years, which could be lost in a twinkling of an eye if elaborate wastewater treatment practices are abandoned along with the remaining mining enterprises in the Butte/Anaconda area.

Baseline biological conditions have been established at 85 sites on 59 streams statewide. The Biological Monitoring Program has established biological norms for a variety of streams, demonstrated that eastern Montana streams have biological communities that are just as diverse as those in western Montana streams, and revealed that certain western streams are much more sensitive to acid deposition, acid-mine drainage and heavy metals pollution than the others. The first follow-up sampling was conducted in 1980 and analyses were completed in FY 1983. Future visits will be scheduled once statistical problems are resolved, time and resources permitting.

Intensive surveys, a mobile and customized form of fixed-station monitoring, are scheduled periodically to provide specific information to other WQB programs. Nineteen intensive surveys were completed in FY 82, about 15 in FY 83 and several more are scheduled in FY 1984-85. Future intensive surveys will attempt to document biological recovery in streams that receive discharge from wastewater treatment plants which are scheduled for upgrading from primary to secondary or advanced treatment.

The WQB has identified and does require permits for all discharges. Major industrial discharges are monitored or inspected at least twice each fiscal year; major municipal discharges are monitored or inspected at least once each year.

In accordance with the Statewide 208 Plan, the WQB Water Quality Management Planning program has been helping conservation districts and state and federal agencies to identify and correct their most serious nonpoint-source water quality problems. Most of these problems stem from improper agricultural, forestry and mining activities and they account for the lion's share of degraded stream segments in Montana.

Primary accomplishments during federal fiscal year 1983:

Planning and Program Development

- Prepared and submitted to EPA the state 205(j) work plan for state fiscal years 84-85.

- Conducted a joint review and revision of the DHES/U.S. Forest Service cooperative agreement.

Monitoring, Intensive Surveys and Data Management

- Conducted monthly water quality monitoring on the Clark Fork River at Warm Springs, Deer Lodge and Garrison.

- Began seasonal biological monitoring on the Clark Fork River at Warm Springs, Deer Lodge and Garrison.

- Began before-and-after intensive surveys on four streams receiving WWTP effluents to document biological recovery following WWTP upgrading.

- Collected basic water quality data for 113 streams to fill data gaps identified by the 1982 305(b) report.

- Coded areawide 208, Indian and federal agency water quality data for entry into STORET to update and expand data base.

- Completed laboratory analysis of the 1980 biological monitoring samples.

- Published reports on the Big Pipestone Creek sediment survey, the Muddy Creek/Sun River biological impact study and the Freezeout Lake/Teton River surge-relief evaluation.

- Funded bimonthly or quarterly monitoring by USGS of COD and TSS at seven NASQAN sites.

- Maintained an approved quality assurance program external to the laboratory.

- Made timely entries of WQB data into STORET.

- Began planning for a biological data storage and retrieval system.

Nonpoint Source Water Quality Management

- Completed a forestry water quality training package through a grant to the Department of State Lands Forestry Division.

- Provided assistance to conservation districts in reviewing 310 applications and in implementing their long-range water quality plans through a grant to the Department of Natural Resources Conservation Districts Division.

- Completed the Beaver Creek stream corridor management program through a grant to the Hill County Conservation District and the MSU Cooperative Fishery Unit.

- Provided aerial photos of the Smith River to the Cascade and Meagher county conservation districts for completing their streambank physical features inventory.

- Completed a riparian demonstration project on Willow Creek through a grant to the Carbon County Conservation District.

- Completed an irrigation management/water quality study near Forsyth through a grant to the Rosebud County Conservation District.

- Monitored water development on the Yellowstone river with reference to the Department's instream flow reservation.

- Compiled and reviewed water quality and hydrologic data for the Clark Fork River.

- Began final stage of Prickly Pear Creek stream corridor management program through a 205(j) grant to the Lewis and Clark County Conservation District.

- Reviewed and evaluated water quality impacts of numerous resource development plans statewide.

Drinking Water

The initial Montana law relating to public water supplies was originally enacted in 1907. This law was revised in 1977 and again in 1979 to enable Montana to receive and retain delegation for administration of the "Federal Safe Drinking Water Act" (PL 93-523) enacted in 1974. Montana's program covered about 250 community water systems prior to 1978. The present program regulates all systems which have at least 10 service connections or serve 25 individuals daily for at least 60 days a year.

The public water supply (PWS) inventory varies, but usually includes about 600 community water systems and 1,300 non-community water systems.

From a quality standpoint, the state's drinking water is considered generally good in western Montana. Many supplies in eastern Montana, particularly groundwater, would be considered poor. The exceptions in western Montana are those waters high in turbidity. In the eastern part of the state, the communities using surface supplies, with few exceptions, have water treatment facilities capable of providing quality water. However, the groundwater supplies are generally high in total dissolved solids. Some of the smaller supplies have fluorides and nitrates which exceed the maximum contaminant level (MCL). The following information identifies, on a statewide basis, the fluoride, nitrate, arsenic, selenium and turbidity problems in the state. Some of these systems are planning improvements to their systems which will enable them to meet the MCL.

The vast majority of Montana's public water supplies are monitoring for bacteriological quality on a regular basis. The maximum concentration level for coliform bacteria is rarely exceeded. When it is, WQB engineers work with Public Water Supply (PWS) personnel to identify and solve the problem.

Radiological monitoring of the vast majority of Montana's PWS's has been done and a creek sampling program is now in progress to determine the systems that exceed a radiological MCL.

Community Public Water Supplies Which Exceed MCL's:

Supply	Constituent	Reported Level (mg/l)	Maximum Contaminant Level(MCL)
Ashland	Fluoride	4.2	2.4
Franchi's Trailer Court Boulder		9.5	
Circle		5.6	
Coffee Creek		5.6	
Lambert		4.5	
Geraldine		2.9	
Richey		4.4	
Highland Park, Glendive		3.8	
Spring Grove Tr. Ct., Glendive		3.3	
Cheeks Tr. Ct., Glendive		3.8	
Alta Tr. Ct., Miles City		3.8	
Bills Trailer Villa, Miles City		2.6	
Greenstar Mobile Home Village, Miles City		3.0	
Palisade Apartments Miles City		2.5	
U.S. Livestock Station Miles City		2.6	
Wagon Wheel Motel Miles City		2.6	
Thiel Valley Water, Sidney		5.1	
M & R Mobile Home Village, Fairview		5.0	
Wagon Wheel Tr. Ct., Forsyth		5.5	
Winnett		3.1	
Flaxville	Nitrate	34.0	10.0 as NO3-N
Rapelje		30.6	
Coffee Creek		14.0	
Denton		13.0	
Aldrich Springs Conrad		25.0	

Supply	Constituent	Reported Level (mg/l)	Maximum Contaminant Level(MCL)
King Colony Lewistown		14.0	
Rockport Colony Pendroy		62.0	
Turner Colony, Turner		35.5	
Birch Creek Colony, Valier		48.0	
Front Street Supply Milltown	Arsenic	0.20	0.05

Community Public Water Supplies which utilize surface water and have exceeded the maximum contaminant level more than one month of the year.

Bozeman (Bozeman will have a new treatment plant on-line by the end of 1983)
Tiber County Water District, Conrad
Neihart
Sheridan

Some of the past year's primary accomplishments in the drinking water program include:

- The completion of the radiological monitoring program.

- The initiation of the check sampling program for PWS's that may have a radiological problem.

- Legal action has been pursued against several PSW's that refused to monitor for coliform bacteria.

- More progress is being made toward bringing noncommunity systems into compliance.

- Helena is on a compliance schedule to meet the turbidity standard.

- The WQB worked with the farmers Home administration, Department of Natural Resources and Conservation and Department of Commerce to fund public water supplies.

- Red Lodge is planning to build a new plant to solve a Giardia problem.

- Legal actions have been taken against systems that exceed MCL's.

- Several small systems have been required to install full-time disinfection.

- Progress was made toward eliminating the nitrate problem in the Flaxville system.

- Successful legal action was taken against a city for failure to submit plans and specifications for review.

- Several systems are in the process of making the improvements necessary to meet the turbidity standards.

- The operator training program is working jointly on a training program with the Montana Rural Water Users Association.

- More on-site inspections are being performed on systems with problems, including new systems with problems caused by improper construction.

- The new word processor has increased office efficiency and new uses are being developed.

- Coordination will continue of the department plan review.

Construction Grants

A federal grant program was initiated in 1956 to assist municipalities in the construction of sewage treatment facilities. The state has assisted the EPA and predecessor agencies in administration of this program by establishing needs and priorities, and reviewing project applications and preliminary and final plans. Federal grants on projects have increased from 30 percent to 75 percent (85 percent where the project uses innovative or alternative treatment mechanisms such as land disposal) of eligible project costs.

Using the priority system developed by the WQB and approved by EPA, a priority list is drawn up at least once a year. Grant monies are then set aside for the top communities on the list.

During FY 82 the Municipal Wastewater Treatment Construction Grants Amendments of 1981 (PL 97-117) were passed that changed the entire grants program. The program went from a three step program (i.e. Step 1 - Facility Planning, Step 2 - Design and Step 3 - Construction) to a program where only one grant (Step 3 - Construction or Step 2 and 3 - Design and Construction) is offered and within that grant an allowance is given to cover a portion of the costs of facility planning and design. There is an exception where small, needy communities may receive an advance for the facility planning and design should the state decide these communities qualify. Numerous other changes make the program more flexible and should allow for added state and local discretion.

Funding for the construction grants program has not been appropriated for FY 1984 or 1985. PL 97-117 authorized funding of the grants program for four years at $2.4 billion per year. The authorization, should it be appropriated, would give Montana approximately $12 milion per year. Such an appropriation would allow funding of four to ten projects per year. This number is dependent on the cost of the projects that rank the highest on the state priority list.

Primary accomplishments in the Construction Grants Program in FY 1983 included:

- The state has retained full delegation of the construction grants program. During FY 83, EPA has continued after-the-fact oversight procedure for the monitoring of the state program. The state has actively participated in the EPA Management and Evaluation System (MES) and will continue to participate in this program or the proposed water accountability system.

- Total obligations of approximately $11 million.

- FY 1983 priority list developed, based on a priority system that was revised to reflect PL 97-117 requirements.

- Program evaluation completed by EPA.

Wastewater Discharge Permit Program

Montana's wastewater discharge permit program began in 1968. With passage of PL 92-500 (Water Pollution Control Amendments of 1972), a federal wastewater discharge permit program was also initiated. In 1974 Montana applied for and received authority from EPA to administer this program, thus minimizing duplication of effort. EPA established wastewater discharge limitations for the various categories. Where these limitations do not allow the meeting of water quality standards (including nondegradation of high quality waters by new discharges or existing industries), stricter limitations are imposed.

Tables #1 and #2 list the various categories of major and minor industrial wastewater discharges and their present status with regard to compliance and enforcement. Most of the projects shown as inactive have eliminated their discharges to surface waters and therefore, do not need a wastewater discharge permit.

Table #3 lists the status of the municipal discharges. Montana's five largest cities (Billings, Great Falls, Butte, Missoula and Helena) all have treatment facilities capable of meeting effluent limitations with the possible exception of chlorine residual and fecal coliform bacteria. There are discharge limitations on chlorine residual because of its toxic effect on aquatic life, and meeting these limitations sometimes does not allow the municipality to meet the fecal coliform limits. Some coliform limits may be revised based on receiving stream flows and will still meet water quality standards. Chlorine residual limitations will take into account the toxicity of free and combined chlorine.

Many of the communities meeting discharge limitations still have treatment facility needs. For example, Helena, Kalispell and Missoula all need improvements to their sludge disposal systems. Helena and Kalispell had serious odor problems due to present sludge disposal practices, but are implementing land injection as an interim solution. As for a permanent solution, the cities are planning to install anaerobic digestors. The discharge standards for total suspended solids in sewage lagoons were relaxed by EPA and, hopefully, this will allow many of the smaller

communities to meet effluent limitations with a minimum amount of improvement.

It should be noted that essentially all dischargers (including those not in compliance) have constructed substantial treatment facilities during the last 25 years. The large percentage of noncompliance of major industrial dischargers versus the low percentage of minor dischargers is partially due to their more complex treatment facilities and greater bureau review of those that have the potential to do the most serious stream damage.

Table 1. Status of Major Industrial Wastewater Discharge Permittees

Category	Total No.	Active	Inactive	Substantially In Compliance	Not In Compliance
Major					
Sugar Refining	2	2		2	
Coal Mines	3	3	0	3	0
Smelter	3	3	0	1	2 (note 1)
Plywood Mills	2	2	0	2	0
Oil Refineries	4	4	0	3	1 (note 2)
Paper Mills	1	1	0	1	0
Generating Plants	2	2	0	2	0
Ore Mining	2	2	0	2	0
Railroads	1	1		1	
Meat Packing	1	1			
Totals	21	21	0	18	3

1. Anaconda-Warm Springs - Smelter now closed. Discharge from housekeeping and other minor industrial activity is significantly less than before shutdown and is not expected to cause modified permit violations. Permit contains compliance schedule for water quality standard limits. Anaconda-Butte - At no discharge during normal operation. Not expected to violate permit limits. Anaconda - Great Falls - Refinery closed. Permit concentration limits often violated.

2. Farmers Union - Operating on compliance schedule.

Table 2. Status of Minor Industrial Wastewater Permittees

	Active	In Compliance	Not in Compliance	Notes
Fish Farms	20	20	0	
Irrigators	0	0	0	Considered nonpoint sources under Federal legislation.
Feed Lots	81	81	0	See note 1 below.
Oil Wells	10	10	0	
Mines	90	90	0	
Smelters	1	1	0	
Dairies	0	0	0	
Railroads	5	5	0	
Lumber & Plywood Mills	1	1	0	
Oil Refineries	1	1	0	
Highway Projects	7	7	0	
Sand & Gravel	5	5	0	
Slaughter Plants	1	1	0	
Cement Plants	2	2	0	
Chemical Plants	1	1	0	
Generating Plants	1	1	0	
Industrial Sewage Treatment Plants	9	9	0	Mt. Power Dam Plant and Champion Build Products plants.
Miscellaneous	15	15	0	
Totals	250	250	0	

1. Includes 41 smaller feed lots active on state permit program, but not included as part of federal permit program.

Table 3. Status of Municipal and Federal Wastewater Discharges

	Substantially In Compliance		Not in Compliance With Secondary Treatment Standards	
	Major	Minor	Major	Minor
Sewage Treatment Facilities				
Municipal & State	15	55	11	20
Federal & Indian	--	14	1	4
TOTALS	15	69*	12	24
Water Treatment Facilities/Wastewater Disposal				
Municipal	--	10	--	4
Federal & Indian	--	1	--	0
TOTALS		11		4

*About 1/2 of these have no surface water discharges.

Primary accomplishments in the program for FY 1983 were:

- Approximately 135 new permits were issued.

- General permit program regulations were approved by EPA.

- Issuance of general discharge permits for small suction dredges, construction dewatering, small facultative sewage lagoons and feedlots.

- Groundwater regulations and standards were finalized and passed by the Montana Board of Health and Environmental Sciences.

- Implementation of a groundwater protection program is underway--permits are being issued.

- Completed compliance monitoring inspections as outlined in FY 83 SEA.

- Approximately 160 public complaints were received and processed.

- Eight Violation Report Forms were sent to the DHES Legal Division requesting assistance.

- Five Notices of Violation and Orders to Take Corrective Action were issued.

- Five civil complaints, including requests for assessment of civil penalty and corrective action, were filed.

- Two civil complaints were settled, resulting in corrective actions and collection of $6000.00 in civil penalties.

- Six civil complaints including a civil penalty are pending resolution.

- Approximately 150 preliminary enforcement letters were sent and included notices of violation of permit requirements and requests for corrective actions.

- Three sets of plans were reviewed for qualification for preferential tax classification.

- Approximately 350 enforcement conferences were held for the purposes of negotiating, developing cases, preparing for court appearances and setting policies, priorities and objectives.

- More than 1500 self-monitoring reports were reviewed, with appropriate responses included.

- Drafted a general permit for feedlots.

- Renewed and issued 15 feedlot permits.

- Conducted field reviews on 20 404 permits.

- Reviewed and provided technical assistance on several applications for groundwater and surface water discharge permits.

- Participated in numerous complaint investigations on point and non-point source pollution problems.

Looking to FY 1983 and the issuance of new permits, the WQB expects many applications from new mining operations, most of which will be for discharging into high quality waters. Some of these will be small suction dredges which can be handled under the suction dredge general discharge permit. The WQB has decided to process other placer mining discharges by individual permits. There will be a number of applications in the beneficial use subcategory for discharge of water from oil producing wells. There will also be applications from saline seep areas for discharge of saline waters.

It is highly unlikely that many of these saline discharges will be allowed, due to their potential impact on surface waters. There will also be several permit applications for highway contractors to pump water from forms used in bridge pier construction. Most of these can be handled under the dewatering general discharge permit. Some applications are expected from geothermal energy sources.

The WQB's major jobs in the permit area will be assuring that permittees are complying with existing permits, and to get the new applications processed.

Air

The Big Sky Country is truly what its name implies, yet there are places where the quality of air is a fragile resource. The plains east of the Rocky Mountains provide few obstructions to the sea of air that flows across the land, but in western, southern and central Montana, where various mountain ranges form valleys, air sometimes is trapped in layered inversions, causing degradation.

In addition to inversions and natural sources of contamination, man also plays a part in altering air quality. In urban areas throughout the state, such things as street dust, smoke from fireplaces and industrial emissions contribute to lowering air quality and visibility. In rural areas the largest contributors to air quality degradation are unpaved roads and mining operations.

In FY 1982 implementation plans have been developed and are being carried out for all areas save East Helena (lead) and Great Falls (carbon monoxide). The extent of the lead problem in East Helena has been identified and work is underway in developing control strategies to reduce lead concentrations to acceptable levels. In Great Falls the carbon monoxide evaluation has been completed and control strategies are being identified. An SIP will be submitted for both areas during late 1983.

A revised plan to control TSP in Butte as well as a request for redesignation to attainment was submitted in early calendar year 1983. Submission of this plan was delayed because the control strategies initially envisioned proved unfeasible.

A study was recently completed in Billings to define the nature and extent of sulfur dioxide concentrations. Analysis of the data is continuing to establish whether violations of ambient air quality standards exist. If violations do exist, the area may be designated as nonattainment and an implementation plan will be developed.

The Missoula carbon monoxide attainment plan contains major modifications to the intersection of South, Brooks and Russell. This project necessitated an extension to 1984 to meet the standard. Preliminary work is now underway on this project. Despite these efforts, it appears standards will not be met without further reductions from residential wood burning. Missoula is now actively working on those strategies. Rules governing wood emissions will probably be in place late this summer.

During the next year the AQB will be submitting requests for redesignation to attainment for total suspended particulate for Columbia Falls, Colstrip, Billings and Great Falls. In addition, a request for redesignation of East Helena to attainment for sulfur dioxide will be forthcoming.

The AQB processed more than 100 permits to assure that new air pollution sources comply with all air quality rules and standards. The DHES performed in excess of 17,000 laboratory analyses on 4,000 samples to evaluate the effects and levels of air pollution. It analyzed 121,000 hourly field samples to investigate the air pollution levels throughout the state.

The AQB enforced compliance with air quality rules through 140 field surveillance actions several notice of violations and in one case imposition of civil penalties.

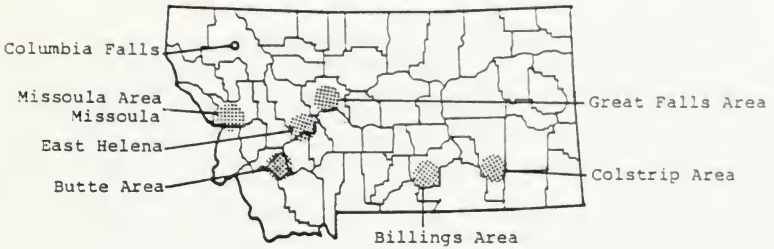
Montana's ambient air monitoring network was reviewed and modified as necessary.

Changes in permit and PSD rules were completed in order to obtain a fully approved implementation plan.

Only the towns and areas identified in the following maps and tables are not in compliance with primary or secondary air quality standards. The remainder of the state meets the standards or is unclassified. Additionally, the entire state appears to meet the standards for nitrogen dioxide and ozone.

As stated earlier, plans have been developed and are being implemented for all nonattainment areas except East Helena (lead), Great Falls (carbon monoxide) and Missoula (carbon monoxide).

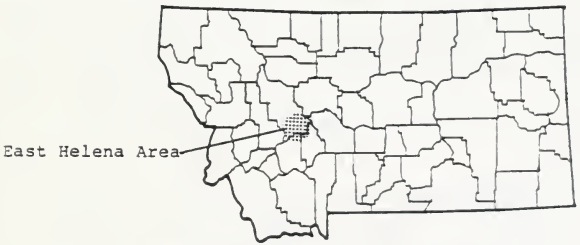
TOTAL SUSPENDED PARTICULATE



Designated Area	Does Not Meet Primary Standards	Does Not Meet Secondary Standards	Reasons
Colstrip Area	X		Street Dust and Strip Mining
Columbia Falls	X		Street Dust
Missoula	X		Street Dust, Smoke From Fireplaces and Industry
Missoula Area		X	Unpaved Rural Roads and Industry
Billings Area		X	Street Dust
Great Falls Area		X	Street Dust
Butte Area	X*		Street Dust and Mining Operation
East Helena		X	Street Dust and Industry

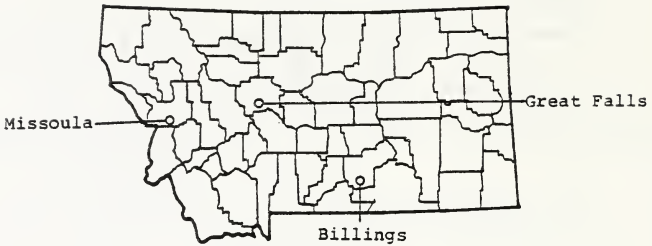
*EPA designation replaces state designation

LEAD



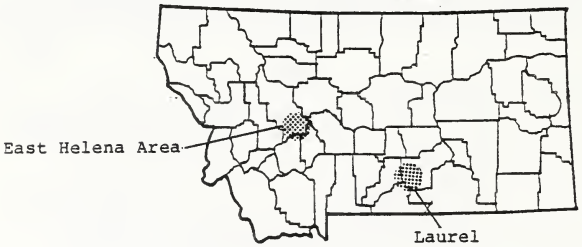
Designated Area	Does Not Meet Primary Standards	Reasons
East Helena Area	X	Smelter

CARBON MONOXIDE



Designated Area	Does Not Meet Primary Standards	Reasons
Billings	X	Exhaust From Motor Vehicles
Missoula	X	Exhaust From Motor Vehicles
Great Falls	X	Exhaust From Motor Vehicles

SULFUR DIOXIDE



Designated Area	Does Not Meet Primary Standards	Does Not Meet Secondary Standards	Reasons
Laurel Area	X		Refinery (further study)
East Helena Area	X		Smelter (should meet standards in FY '83)

Solid and Hazardous Waste Management

The disposal of solid waste has become a major, complex problem in Montana. Due to its nature, it also relates to air, water and land pollution. In the future, the solid waste problem will become more expensive, expansive and complex. It is becoming clear that the concerted efforts of all levels of government, as well as in the private sector, must be employed to ensure proper waste management.

Our society consumes enormous quantities of material and energy which in turn generates an exceedingly large volume of waste. Currently, approximately 600,000 tons of municipal solid wastes are being generated every year in Montana, and given the well-established waste generation rates, by 1990 nearly 870,000 tons of waste will be generated per year. This waste is being disposed in more than 230 identified municipal disposal facilities and numerous undisclosed dump sites.

In addition, from state surveys it has been established that approximately 200,000 tons of potentially hazardous wastes are generated each year in Montana. This volume of hazardous waste includes pesticides, heavy metals and other industrial chemical wastes. Furthermore, a large number of "empty" pesticide and other toxic chemical containers of all sizes are discarded annually.

The state now possesses sufficient regulatory authority to control solid waste disposal. As required by the 1977 "Montana Solid Waste Management Act," the Solid Waste Management Bureau (SWMB) currently is licensing all solid waste management systems in the state. This licensing procedure assures that all such systems will provide a basic public service and not degrade the environment. To date, a total of 221 waste management systems have been licensed by the bureau.

Montana, through the SWMB, has received Phase I Authorization to manage a state hazardous waste management program. In addition, the 1981 Montana State Legislature enacted significant hazardous waste legislation which will allow the state to receive full authorization to oversee the state hazardous waste program. A completed application for full authorization to manage a state hazardous waste program is to be submitted by July 26, 1983.

The following number of businesses are presently regulated under the hazardous waste program:

Generators	115
Treatment, Storage and Disposal Facilities	16
Transporters	32
Small Quantity Generators	100*

*Number of registered generators reclassified to small quantity status: actual number of small quantity generators in Montana would be a far larger number.

Currently, no licensed commercial hazardous waste disposal facility is located in Montana. This situation does not pose an immediate problem because of the availability of such sites in neighboring states. However, with the inauguration of a statewide hazardous waste program the difficult task of siting a hazardous waste disposal facility may have to be initiated in Montana.

Small quantity generators of hazardous waste currently are conditionally exempted from the hazardous waste regulations. This exemption is placing growing adverse impacts upon the state. It is anticipated that small quantity generators will continue to attempt to use municipal disposal facilities for disposal of their special wastes. This development will place continuing responsibilities and risks on the owners of these municipal facilities. The risks may be especially great from the standpoint of occupational and public safety considerations at such disposal sites.

In addition, there is an increasing number of private and municipal disposal facilities in the state which are refusing to accept hazardous wastes in any quantity. This development is certain to result in the expanded dumping of wastes into such areas as open dumps with uncontrolled access and no supervision. This dumping will further increase the threat to public health and safety through unsuspecting contact with such wastes.

Because of the action by the federal government to eliminate support for Subtitle D activities, the state currently is hard-pressed to adequately address the issue of small quantity hazardous wastes. However, because of the importanceof the issue, the SWMB intends to assist, to the extent possible, not only small quantity generators, but also owners of municipal disposal facilities. This assistance will principally be in the form of assisting in the disposal of such wastes at acceptable facilities and, by doing so, assuring the prevention of illicit hazardous waste disposal.

Primary accomplishments for FY 1983 include:

The 48th Montana Legislature authorized the DHES to cooperate with the federal government in the implementation of the "Federal Comprehensive Environmental Response, Compensation and Liability Act of 1980" (CERCLA). This act enables the department to acquire the necessary revenues to match federal monies required to remedy the release of hazardous substances and contaminants from uncontrolled hazardous waste sites.

Five uncontrolled sites in Montana have been placed on the National Priority List. The state, through the SWMB, has entered into cooperative agreements with EPA on two of these individual sites to initiate remedial action. These cooperative agreements allow the state to be the lead agency in conducting remedial action at uncontrolled sites. Initial action at all sites consisting of two phases: remedial investigation and feasibility studies. Refer to Priority Accomplishment Strategy for a more detailed description of this activity.

During the later part of the fiscal year, the SWMB applied for and received a grant from EPA to implement Section 3012 of RCRA. The project

is intended to discover, assess and inspect potentially uncontrolled hazardous waste sites.

The establishment of a fee system to assist in the management of a state hazardous waste program has received legislative approval. Under the fee system--which is now being implemented--hazardous waste generators and treatment, storage and disposal facilities are required to pay a fee to the state to help defray the costs of managing the state hazardous waste program.

A completed application for full authorization to manage a state hazardous waste program has been submitted to EPA. The mechanisms to manage a state program have been established including the provisions for the licensing of hazardous waste treatment, storage and disposal facilities. The SWMB has established a working relationship with the industrial community which is to be regulated under the hazardous waste program..

Refinements in the state emergency response program were continued especially in the further development of internal response procedures and the equipping of the emergency response team.

Specific disposal problems and sites were evaluated in 103 cases during the year involving industrial waste disposal.

The SWMB continues to issue licenses and inspects solid waste management systems throughout the state. This licensing and inspection process is used extensively to determine suitable sites for the disposal of special and "small quantity" hazardous wastes.

In addition, the bureau has continued to issue state grants to local government entities to conduct detailed analysis, design and implementation activities connected with the establishment of resource recovery and recycling facilities. During the fiscal year, the bureau has issued such grants to five local government entities.

Pesticides

Montana is primarily an agricultural state and as such requires the use of pesticides to help manage a multitude of pest problems. Based on data collected from commercial applicators, it is estimated that from 2.8-3 million acres are treated commercially each year. There are no accurate statistics available for private applicators, but generally the private applicators treat smaller acreages, do spot treating and field margin treating. In most years, private applicators would probably apply pesticides to 1.5-2 million acres.

The Environmental Management Division, DOA, has a responsibility to not only serve Montana agriculture, but is also mandated to protect the environment and the health of the state's citizens. To do this, the use of pesticides must be closely monitored. Toward this end, the Environmental Management Division administers a pesticide applicator certification

program and an enforcement program. Both programs are now administered by the Enforcement Division of EPA to achieve consistency and continuity of purpose between the two programs. Since their inception, the programs have significantly reduced the amount of pesticide contamination in Montana despite the fact that the number of certified commercial and private applicators has increased significantly since 1976 (Figures 2 & 3).

Recertification of commercial applicators and dealers was implemented several years ago. Private applicators are on a five year cycle, with one of the five agricultural districts being recertified each year. Commercial applicators and dealers are on a four year recertification schedule. The applicator categories have been divided among the four year period, so that not all categories are due for recertification the same year. Continuing certification courses are offered each year so that commercial applicators and dealers can accumulate the required 100 points during the four year recertification period (Figure 4).

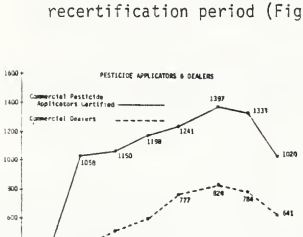


Figure 2

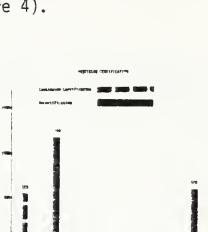


Figure 3

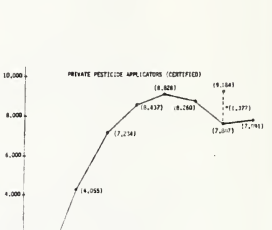


Figure 4

The Environmental Management Division provides pest management services to producers, industry, government agencies and the general public. These services include establishing integrated pest management programs for specific cropping systems, recommendations on use of pesticides, identification and surveillance of pests and the evaluation and resolution of the effects of pesticides on agriculture and the environment. The division also registers 3,960 pesticide products prior to their use in the state; licenses 641 pesticide dealers; licenses 1,020 commercial and government applicators and their employees (597); licenses 7,890 private applicators, and regulates the sale of pesticides using the staff located in Helena and in the five district field offices. The department's laboratory provides analytical regulatory and service analysis to other departmental programs and to the general public. Thus, a more comprehensive pesticide regulatory and service program is provided to Montanans by combining the state and federal pesticide laws and pest management laws than would be provided by each program separately.

The Montana DOA projects the following EPA funded program activities (this does not include state funded activities in these categories) by the end-of-year FY 1983:

	End-of-year FY 1983
Dealer Inspections	600
Pesticide Applicator Inspections	360
Use/Misuse Inspections	115
Market Place Inspections	180
Establishment Inspections	15
Pesticide Accident Investigations	80
Special Investigations	20
Collection and Analysis of Samples:	
Formulation Analysis Performed	550
Residue Analysis Performed	1040
Pesticide Samples Received From EPA--Analysis Performed	300
Certification Training and Examination	
Commercial Applicators (New)	120
Private Applicators (New)	500
Continuing Certification Training (Dealers and Applicators)	523

Pesticide specialists conducted dealer, applicator and marketplace inspections throughout the year. Compliance with pesticide laws and regulations appears to be improving, as fewer major violations were found.

Reports of pesticide incidents or alleged pesticide incidents appears to be on the increase, possibly because of increased media coverage of pesticide use and chemical disposal problems.

Reporting of pesticide use and sales records from applicators and dealers improved greatly during FY 1983. Compilation of these records will provide pesticide use trends within the state. This information will be helpful in establishing priorities in future years.

The analytical laboratory followed its approved quality assurance program on all enforcement samples analyzed. Non-regulatory environmental samples followed quality assurance procedures if requested by the submittor. The laboratory participated in the EPA check sample and sample check analysis procedure programs. The laboratory also developed new analytical techniques for the analysis of several biological and environmental samples.

The DOA, in cooperation with researchers from Brigham Young University, began a study of "The Effects of Endrin and Chlorpyrifos on Wild Avian Species Associated with Grain Fields." Specifically, the DOA

will be monitoring the fate and transport of the chemicals in various environmental parameters.

The DOA applied for, and received, two Specific Exemption (Section 18, Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended) requests for chemicals that could be used as alternatives to endrin for cutworm control in small grains. Use of the chemicals will be monitored to determine efficacy and residue characteristics.

Several pesticide training manuals were revised and printed.

Toxics

Asbestos

EPA regulations requiring public and private elementary and secondary schools in the United States to identify friable asbestos became effective June 28, 1982. Included in the regulations are requirements to identify friable asbestos in building materials, maintain records, notify employees of the location of materials containing asbestos, provide employees with instructions on reducing exposures and notifying parent-teacher associations of inspection results.

Local education agencies must comply with all portions of the rule by May 27, 1983.

EPA's Montana Office will coordinate with the DHES and Montana Office of Public Instruction to assist local education agencies in complying by providing information and technical assistance. School administrators will be informed of the madatory program and will be provided assistance as needed.

A program for inspecting schools for compliance with sampling requirements will be developed and implemented during FY 1984.

Polychlorinated Biphenyl (PCB)

Updated PCB regulations were promulgated by EPA on August 25, 1982 as the result of a lawsuit settlement. These regulations require the periodic inspection of PCB transformers and increased record keeping procedures.

During FY 1983 more than 50 inspections of facilities using PCB's were performed with an equal amount projected for FY 1984. The major users of PCB-containing equipment will have been inspected by the end of FY 1983 and a program of ongoing inspections has been developed for FY 1984.

Over $20,000 in penalties were collected during FY 1983. This aggressive enforcement program will continue through FY 1984 and 1985.

National Environmental Policy Act (NEPA)

In meeting EPA's review responsibility under NEPA, the following major EIS's and assessments were reviewed:

- Many Wilderness Proposals
- USFS Forest Plans
- Numerous BLM Projects
- BPA Transmission Lines
- USFS Seismic Projects

In an effort to identify potential environmental issues and remove assessment deficiences related to construction grants, the Helena, Bozeman, Hamilton, Great Falls and other projects were reviewed. The Missoula project is being closely analyzed through a detailed finding of No Significant Impact.

Public Participation

The review of the draft agreement was sent to persons who indicated an interest in environmental health programs and to state and federal agencies. The agreement was also sent to the Board of Health and Environmental Sciences and appropriate citizen advisory groups for their review and comment.

PRIORITIES

1. Water

-Continue a program to insure that construction grant monies are spent to improve instream water quality. This would involve instream monitoring.
- Further implementation of the groundwater pollution control program in accordance with regulations adopted by the Board of Health and Environmental Sciences.
-Instream monitoring to evaluate the need for and adequacy of current permit requirements.
- Increase WQB involvement in known and anticipated problems such as giardia in municipal watersheds.

2. Air

SIP Implementation and Development
- Analyze Billings sulfur dioxide study and take appropriate action.
- Missoula, Great Falls and Billings CO and TSP
- East Helena, Lead

Source Surveillance
- PSD and new source review
- Inspection of A-1 (Class A) sources
- Emission inventory update

Monitoring
- Continue implementation of National Air Monitoring Station (NAMS) and State and Local Air Monitoring State (SLAMS) network.
- Operate Quality Assurance Program
- Audit Continuous Emissions Monitors (CEM)

3. Solid and Hazardous Waste Management and Superfund

- Implement and maintain a state operated hazardous waste program for all components of the RCRA program.

- Conduct remedial action at the four Superfund sites listed on the National Priority List, and any additional sites which may be listed.

- Conduct discovery, assessment and investigation of suspected uncontrolled hazardous waste sites; and, as appropriate, request their consideration for entry on EPA's list of National Priority sites.

- Implement and maintain a fee system which will defray a portion of the costs to maintain the state hazardous waste program.

4. Pesticides

- Maintain the quality pesticide enforcement and laboratory programs.
- Emphasize the resolution of special pesticide enforcement problems, including the drift of pesticides and the disposal of pesticides and pesticide containers.
- Determine if misuse of pesticides by pest control operators during structural applications is a problem in Montana.
- Improve pesticide applicator educational programs.
- Continue environmental monitoring program to establish baseline pesticide residue levels.

RESOURCE SUMMARY FOR MONTANA-EPA PROGRAMS

The resource summary for all Montana-EPA programs (or media) is shown in the Resource Summary Table (Table 4). Following this table, each program is discussed. The highest priorities within each program are emphasized in the narrative discussion. Detailed work plans which specifically address all program elements within a medium follow the narrative.

TABLE 4

RESOURCE SUMMARY TABLE*

Program	Federal Grant $	State Resources $	State/ Local Work Years	Federal Work Years
Air				
State 105	550,000	383,989	29.00	4.30
Water Quality				
Water/Wastewater Op. Cert.	0	19,885	0.5	0
State 106(total)	278,000	88,144	14.55	2.95
Program Management	32,983	22,415	3.7	.35
Gen & Point Source Plan	45,234	2,726	.45	.48
Operation & Maintenance	20,732	6,361	1.05	.22
Permits	80,102	24,838	4.1	.85
Enforcement	80,102	16,962	2.8	.85
Monitoring	18,847	14,842	2.45	.20
205 (g)	950,000	0	8.00	.55
205 (j)	185,176	38,276	4.75	.30
Drinking Water				
State PWS Grants	312,800	78,200	8.5	.50
State UIC Grants	64,400	0	0	5.00
Solid and Hazardous Waste	220,400	55,100	6.75	3.1
Superfund	1,408,250	25,000	3.0	4.0
Pesticides				
State Enforcement Grants	97,750	24,438	15.00	0.6
State Cert. Tr. Grants	14,000	14,000	0.50	0.1
Categorical Programs				
Toxic Substances	0	0	0	.60
Asbestos in Schools	0	0	0	.25
Indians	278,000	0	.02	.35
Federal EIS Review	0	0	0	.35
Laboratory Support	90,109	0	0	0
Emergency Response	0	0	.43	.50
Quality Assurance	0	0	.05	.3

*Actual funding figures are unavailable at this time. Numbers used are based on FY 83 funding.

PRIORITY ACCOMPLISHMENT STRATEGIES

Air

- Implement Lead SIP
- Implement PSD
- Air Quality Monitoring
- Complete Billings Sulfur Dioxide Study
- Continue Necessary Controls for Oil Well Flaring

Water

- Wastewater Discharge Permit and Enforcement Program
- Drinking Water
- Water Quality Management
- Construction Grants

Solid and Hazardous Waste Management

- Hazardous Waste Management
- Solid Waste Management
- CERCLA

Pesticides

- Enforcement
- Certification

PRIORITY ACCOMPLISHMENT STRATEGIES

Air

SIP

Nearly all nonattainment plans have been approved or conditionally approved. The SIP plan for Great Falls is currently underway with a submittal plan to EPA scheduled in October, 1983. The lead problem in East Helena has been studied and control strategies are currently under development. The plan should be completed and submitted to EPA by October 1983.

A part of SIP implementation is the state's compliance and enforcement program for stationary sources. Continued emphasis will be placed on major source inspections since the Clean Air Act no longer allows for continued noncompliance of major sources through variance procedures. Significant violations by major sources in most instances will have to be dealt with through court actions and, if appropriate, by the imposition of civil or criminal penalties.

PSD

As a result of the Alabama Power Company court case concerning PSD at the national level, Montana has revised its PSD regulations. The regulations are to be submitted to EPA for approval and full delegation of the program. EPA approved Montana's PSD program on June 6, 1983 with three conditions. Two of the three conditions have already been accomplished while the third should be completed before the end of calendar 1983.

Air Quality Monitoring

The accurate measurement of Montana's present and future air quality plays an important role in existing and future SIP revisions. The location and impacts of new sources and proper technical impact analyses are essential for the continued protection of Montana's pristine air quality and to accommodate orderly industrial growth.

The state has completed a review of its air monitoring program and has prepared and submitted a Network Review Report to EPA. Modifications to the existing network will be carried out according to the schedules set forth in the report.

Montana will continue to actively pursue a high quality data retrieval program. Large steps toward this goal were accomplished in 1982 with further steps scheduled for 1983 and 1984. It may be necessary to reduce monitoring efforts at some locations in order to realize this goal.

Billings Sulfur Dioxide Study

As a result of alleged violations of emission and ambient air quality standards in the Billings area, the Department and six area industries signed a stipulation in late 1977 requiring, among other things, an

intensive sulfur dioxide monitoring study. The study was initiated through contract in the fall of 1981. The study was completed in October, 1982. The study involved four monitoring sites near Billings and two near Laurel in addition to upper air meteorological soundings. The Bureau is analyzing the data in order to make necessary determinations regarding non-attainment status. If the area(s) is deemed as non-attainment, the Bureau will begin discussing control strategies for the appropriate sources.

Oil Well Flaring

During the past few years, the Department has become cognizant of an increased amount of flaring sour gas from oil wells. This practice has the potential of emitting significant amounts of sulfur dioxide into the atmosphere. The Bureau will continue to contact these sources to determine the necessity of permits and necessity of control strategy for these sources. Some testing of some wells has begun and will continue in 1984.

Water

Wastewater Discharge Permit and Enforcement Program

The priority of the Montana Pollutant Discharge Elimination System (MPDES) is to administer and enforce an effective wastewater discharge permit program. This is an ongoing program in which permit applications are reviewed and, if appropriate, permits are issued. Major dischargers which have the greatest potential environmental effect receive the highest priority in the program. The minor dischargers are reviewed, but not with as much detail as major dischargers. However, because of their large numbers, minor permits consume large amounts of time. This will be somewhat alleviated because if certain of these categories can be handled by general permits under the general permit program regulations recently passed by the Board of Health and Environmental Sciences. However significant numbers of minor permits do not fit into the general permit categories for various reasons and still must be handled individually.

Self-monitoring reports are submitted by all dischargers for review by the WQB. Compliance monitoring of major dischargers is performed by the bureau at a frequency necessary to assure accurate results. The minor dischargers are compliance monitored when it is apparent that analyses may be in error or the discharger is out of compliance with its discharge limitations. Support is provided by the DHES Laboratory Division in the analyses of samples. Inspections of treatment facilities are also performed to assure adequate operation of facilities. Investigations are also made when complaints are received on permittees or where possible violations are occurring by persons not having a permit.

Compliance schedules are set forth for those dischargers not meeting limitations or if stream standards are violated. For municipalities the compliance schedules are coordinated with the WQB Construction Grants Section so the projects which are creating the biggest problems are given the highest priority for federal funds. Input from the SWMB will be provided to assure that residual wastes are properly handled.

Enforcement action is taken where appropriate. Enforcement may be a letter from the WQB, a compliance order issued by the department or a district court action to seek compliance and may include a monetary penalty. Support is received from the DHES Legal Division and the EPA on enforcement.

Since final adoption of state groundwater regulations, activities in the initial phase of implementation have consisted of development of permit application and processing procedures. Specific groundwater classification efforts will be conducted only as required for permit preparation. Resources to operate the program will come from present MPDES program so a general statewide classification effort is beyond resource capabilities. The level of interest in the program, judged from inquiries to the bureau, is high. Permits are now being issued and resource requirements for the program appear to be significant.

Specific Priorities:

- Issue, reissue or modify major permits ensuring that water quality standards are met; toxic criteria limitations and pretreatment requirements are imposed and residual wastes handled appropriately (input from SWMB to be provided), and appropriate effluent limitations and self-monitoring are provided.
- Issue, reissue or modify other permits.
- Pursue general permit issuance for such categories as fish farms, water from oil wells and feed lots.
- Process 3 (a) authorizations and Water Quality Standard (401) certifications.
- Provide timely complaint response and followup.
- Provide compliance monitoring twice yearly of all major industrial permittee discharges and once yearly for 10 major municipal dischargers, completing form EPA-3560-3 for each.
- Compliance monitor at least 10 minor dischargers where self-monitoring data is suspect.
- Provide a quality assurance (QA) program to assure accureate self-monitoring data for the MPDES program.
- Pursue a vigorous compliance inspection program on mining activities during the summer months when activity is at its peak and gather information concerning impacts on water quality.
- Provide appropriate enforcement and report to EPA, giving priority to major dischargers.
- Provide timely review and appropriate notification on self-monitoring information.

Safe Drinking Water Program Implementation

During the past year the drinking water program has emphasized bringing noncommunity public water supplies into compliance. Also there has been more emphasis on enforcement actions against community public water supply systems that are not in compliance with the regulations.

A combination of reduced funding and inflation is beginning to take its toll on the program. One job position has been lost and, if there are further cut-backs in funding, there will be more losses.

Objectives for the coming year have been changed somewhat to reflect the reduction in manpower. The major objectives for the coming year will be:

- Improve compliance of community water supplies for all of the requirements of the Safe Drinking Water Act.
- Provide enforcement through the DHES Legal Division when community public water supplies are not in compliance with the regulations.
- Monitor and enforce the public notification requirements of the Safe Drinking Water Act.
- Improve the bacteriological quality of those supplies not meeting the MCL for coliform bacteria.
- Grant variances and establish compliance schedules for those systems which need physical improvements to meet MCL's.
- Update regulations as needed.
- Conduct field investigations for approximately 90 percent of all public water supplies.
- Provide technical assistance regarding the operation and maintenance of public water systems.
- Provide training and certification for operators.
- Review plans and specifications for new supplies and improvements to existing systems.
- Develop DHES policies to improve plan review and rewrite regulations as needed. Specifically, write a design manual for non-community PWS.
- Provide certification for chemical and bacteriological laboratories.
- Work to improve compliance of noncommunity public water supplies.
- Conduct cooperative investigations of suspected giardiasis outbreaks by performing appropriate sampling and identification. Positive identification to be followed with assistance toward corrective measures.

Construction Grants

The 205 (g) delegation agreement executed during FY 1981 provides for the state to perform 21 of the 22 major program functions. The state shall be responsible for the day-to-day management of construction grant activities. EPA will provide technical training on program functions and oversight of delegated activities. The state modified the 205 (g) functional agreement to reflect PL 97-117 and shall work with EPA to develop a work plan to meet EPA's water accountability system. These activities will be performed consistent with the availability of resources and funding.

Solid and Hazardous Waste

Hazardous Waste

During the next two fiscal years, a priority will be the final implementation and maintenance of a fully authorized state hazardous waste regulatory program. Such status will encompass complete state authority over hazardous waste generators, transporters and treatment, storage and disposal facilities. This authority will provide for the state primacy in permitting, monitoring and enforcement activities.

The finalization of the state program will include the continuation of notification procedures required of hazardous waste activities by regulated communities. Additionally, inspections and preparation of enforcement actions will be maintained for hazardous waste generators, transporters and treatment, storage and disposal facilities.

The state will continue to maintain an emergency response system which includes a response plan and active emergency response team. This team is comprised of a cross section of state agencies representing a broad spectrum of disciplines. Such a structure assures that state government can provide technical advice and direct assistance to a variety of emergency situations.

As the state's hazardous waste program matures, measures will be taken to assure that adequate work force resources are available. Efforts will be made as needed to secure adequate staffing for the hazardous waste program. In addition, the ongoing training of current staff will be maintained. Such educational efforts will take advantage of training programs offered by the federal government and institutes of higher learning.

A concerted effort will be made to provide public participation. Current state laws and regulations already provide formal provisions for insuring public review and comment in the issuance of all permits. In addition, state law requires the DHES to follow established procedures to guarantee adequate review of any action that will directly impact Montanans. The level of public participation undertaken in other activities will depend on the degree of interest from affected or interested persons. Public participation will rely heavily on the mass media, direct mailings, public meetings and public hearings.

Solid Waste

Under licensing procedures required by state law, the SWMB will continue to maintain an inspection program of all waste management facilities. The bureau will initiate enforcement action on facilities identified as open dumps and for which no effort has been taken to close or upgrade.

The SWMB will continue to maintain a planning grant program to provide technical and consultant assistance to local governments for developing recycling and resource recovery activities.

To the extent possible, the SWMB will continue to monitor and assist in the proper disposal of small quantity hazardous wastes.

The DHES remains unconvinced that there is a true need for a centralized hazardous waste disposal facility in Montana. An evaluation will continue to ascertain the quantity and composition of hazardous wastes in Montana and their geographical distribution.

If a true need exists, regional collection centers will be established where generators may dispose of wastes. Periodically, the material will be transported to approved hazardous waste disposal facilities out-of-state. Continual evaluation will be made of the volume and type of hazardous wastes deposited at the collection centers, and the continued availability of approved disposal facilities out-of-state. If, this evaluation, demonstrates a need for such a facility, action will be initial to develop a centralized hazardous waste disposal facility in Montana.

CERCLA

Remedial investigations and feasibility studies will continue on the five uncontrolled hazardous waste sites identified in the National Priority List. The purpose of remedial investigations is to determine the nature and extent of the problem at the sites and gather all necessary data to support work conducted during the study period. Feasibility studies are intended to develop and evaluate remedial alternatives, prepare cost estimates for the alternatives, prepare an environmental assessment of alternatives, recommend appropriate cost-effective remedial action and develop a conceptual design for approved action. As the most appropriate alternative or alternatives are selected, remedial and clean-up activities will be initiated.

Expenditures of funds under this program will be used generally in three types of situations: (1) for emergency response to hazardous materials spills; (2) for remedial action at sites where hazardous materials have been deposited in the past; and (3) for removal actions at hazardous waste sites where removal is determined to be the most cost-effective solution to an environmental problem.

To date, 79 sites in Montana have been registered with EPA's Emergency and Remedial Response Inventory System (ERRIS). Five of these uncontrolled sites have been placed on the National Priority List and remedial investigations/feasibility studies have been initiated at these sites. Initial prioritization of the remaining uncontrolled sites on the ERRIS list is now taking place by state and EPA officials. The initial prioritization has identified 21 uncontrolled sites that are a high priority for further investigation and 16 sites that are considered a medium priority for additional inquiry.

The SWMB has applied for and received grant funds under Section 3012 CERCLA to conduct preliminary assessments and, where necessary, conduct site inspections of potentially uncontrolled wastes sites identified in EPA's ERRIS. Under the project, preliminary assessments will be made of potential uncontrolled waste sites identified and previously placed into ERRIS. Initial prioritization by state and EPA officials have identified 37 sites with a high or medium priority listing. It is the intent of the project to concentrate preliminary assessment activities on these sites.

It is estimated that eight of the potentially uncontrolled sites tentatively identified as high or medium priority, will require site inspections.

In the course of conducting project activities, efforts will be made to identify uncontrolled waste sites currently not listed in ERRIS.

Pesticides

Enforcement

The DOA's authority for registering pesticides, licensing and certifying applicators, licensing dealers and operators and for conducting inspections and carrying out enforcement actions is provided for in the Montana Pesticides Act, Section 80-8-101 through 306 MCA 1979.

The DOA proposes to continue the comprehensive cooperative enforcement program and agreement with EPA through inspections (including use/misuse, restricted and general use products, records and proper licensing), investigations, pesticide sampling, laboratory pesticide analysis, efficacy studies and enforcement actions. These activities would be continued under the quality assurance agreements made with EPA under previous grants. The DOA's pesticide specialists hold EPA credentials and have the authority to carry out the mandates of the FIFRA as well as the Montana Pesticides Act.

The DOA has been granted "primacy" under Section 26 of FIFRA, as amended. Primacy was granted to Montana as set forth in the cooperative enforcement agreement with EPA which will be continued. It is the intent of the department to serve as the primary agency in conducting inspections, investigations and sample collection and analysis in accordance with EPA approved procedures and to take effective action against violators. The outputs listed in the media work plan reflect those that are funded by the grant and those that will be funded by the state. The DOA will continue to issue and monitor Section 24(c)'s, Section 18's and experimental use permits.

The DOA's field services bureau and pesticide analytical laboratory will continue to maintain the quality assurance program for sample handling and analysis. The laboratory will continue to provide pesticide analytical services to EPA and other states on a fee basis which will cover the cost of supplies, materials and communications.

The DOA will adopt the compliance monitoring strategy for the Label Improvement Program (LIP) requirements as well as the Child Resistant Packaging (CRP) requirements which will be issued by EPA. This compliance monitoring strategy will be reflected under the Producer Establishment Inspection category.

The DOA will investigate pesticide drift problems. This will include defining drift problems in Montana; developing procedures to prevent herbicide damage to, and illegal residues in, off-target vegetative crops, ornamentals and grasses; developing procedures to prevent off-target insecticide drift which may affect human health and cause illegal residues in the environment, and developing sampling techniques and procedures for the collection and analysis of environmental samples affected by drift.

These procedures will be supplemented with an improved educational program directed at both private and commercial applicators.

The DOA will develop, in cooperation with the DHES, an educational compliance and enforcement program on disposal of pesticides and pesticide containers.

The DOA will continue the program of environmental sampling and monitoring. This will include continuing the monitoring program for pesticides in soil, crops, domestic animals and wildlife to provide baseline data, and selecting monitoring areas based on types of pesticides used and the time (month, season) of greatest use. Monitoring of ground and surface waters is being proposed if additional EPA funding is made available.

Through inspectional activities the DOA will determine if misuse by pest control operators during structural applications is a problem in Montana.

The DOA will determine if farm (migrant) worker exposure to pesticides before, during and after application is a problem in Montana. This will be accomplished initially through discussions with the DHES and the migrant labor offices.

The DOA does not anticipate any major spray programs in Montana during FY 1984. However, should one occur, the Department will monitor it and institute any necessary enforcement actions.

A state priority for FY 1984 is revamping and improving the pesticide educational courses offered to pesticide applicators and dealers. Beginning October 1, 1983, private applicators will be required to obtain 100 training credits during a five year period to maintain their certificate status. Emphasis will be placed on better label interpretation and understanding and potential environmental impacts resulting from pesticide use.

The department has developed a list of restricted pesticides that have actual or potential adverse effects on the environment, human health or agriculture. A written document (chemical review) of each of these pesticides will be prepared and will be available to other agencies and the public.

The FY 1984 SEA priorities are for a two year period. However, after year-end evaluation, several may have to be modified or discontinued. Any modified or new priorities would be identified in the FY 1985 SEA Pesticides Media Work Plan.

The specific activities and accomplishment commitments (federal and state) can be found in the Pesticides Media Work Plan.

Certification

The certification program is a federally mandated program which requires pesticide applicators using restricted-use pesticides to comply

with state and federal certification standards. The Montana Certification Plan was approved by EPA and has been in effect since 1976.

The strategy will be to maintain the data processing system for the storage of qualification data for dealers and applicators and for the issuance of certification credentials to qualified applicators as well as to newly certified individuals entering the system.

Most of the commercial and government applicators requiring certification have been certified, but the strategy will be to conduct at least one general certification course (24 hours) for new applicators who wish to be certified. Indications are that approximately 85 percent of the private applicators desiring certification have been certified. The strategy will be to conduct training for private applicators in those counties where the need is expressed.

The strategy for recertification will be to provide recertification training for the following applicator categories: Seed Treatment; Demonstration and Research; Industrial, Institutional, Structural and Health Related; and Public Utility. Additionally, the private applicators in Agricultural District I will receive recertification training specific to their needs (crops, cropping systems and pest complexes present).

MEDIA WORK PLANS

Air

Water

Hazardous Wastes

Pesticides

Categorical Programs

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
I. Air Activities					
A. Point Source Compliance					
1. State shall inspect each Class A-1 source and approximately 1/2 of Class A-2 sources at least once per year. In addition to the State inspections, EPA-Montana Office shall perform 12 facility overview inspections of Class A sources.	30	80			AQB, EPA
2. Provide EPA within 10 days copies of all violation inspections/reports.					AQB
B. Area Source Compliance - Inspect significant area sources at least once per year.		As Required			AQB
C. Enforcement - State shall take formal enforcement actions against significant A-1 and A-2 violators within 60 days following the violation. After 60 days appropriate enforcement action may be initiated by EPA.		Necessary Action			AQB
D. Emission Inventory Update - Update the emission inventory for Class A-1 and A-2 sources. Provide quarterly updates through Emission Inventory System (EIS) on compliance status.	30	80			AQB
E. Track TSP and CO implementation plans in nonattainment areas.	As Required				AQB
F. Identify A-1 and A-2 source classification.		Update EIS			EPA

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
G. Missoula Study					
1. Continue tracking CO progress and modify SIP if warranted.		As Required			AQB
2. Modify TSP SIP to address residential solid fuel combustion problem.		6/84			AQB, EPA
H. Lead SIP					
1. Submit SIP to EPA.	10/83				AQB
2. EPA take action.	3/84				EPA
I. Great Falls CO					
1. Submit plan to EPA.	10/83				AQB
2. EPA take action.	3/84				EPA
J. New Source Review					
1. Permits - Issue approximately 80 new source permits. Copies of permits will be sent to EPA.	40	80			AQB
2. New PSD Review - Review and issue approximately 15 PSD permits. Copies of permits will be sent to EPA.	2	4			AQB, EPA
3. Baseline Monitoring and Data - Review industry baseline monitoring systems and subsequent data for approximately 4 PSD sources.	2	4			AQB

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
4. Increment Modeling and Tracking - Review industry baseline monitoring systems and subsequent data for approximately 4 PSD areas.	2	4			AQB
K. Submit redesignation requests for Colstrip (TSP), East Helena (SO_2), Columbia Falls (TSP), Billings (TSP and CO), and Great Falls (TSP and CO).					
L. Oil Well Flaring					
1. Continue evaluation of oil well flaring (sulfur dioxide) in Williston Basin.					
2. Coordinate with North Dakota similar air quality impacts.					
3. Consider rulemaking for control of oil well flaring.					
M. Monitoring					
1. Complete annual network review.	1 Report	4/84			AQB
2. Complete annual review of quality assurance plan and standard operating procedures.		7/84			AQB
3. Quarterly reporting of NAMS data and agency precision and accuracy data.	As Required	Ongoing			AQB
4. Perform system audits of State air monitoring program.		9/84			EPA
5. Emission Monitoring Program - Audit continuous emission monitors at designated sources.		Ongoing			AQB

AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	AGENCY
	Date of Completion				
N. Controlled Trading					
1. Develop controlled trading generic SIP under new EPA policy guidance, pending U.S. Supreme Court decision.					
O. Training					AQB
P. SIP Progress					
1. Prepare annual SIP progress report.		4/84			AQB
Q. Conduct annual performance evaluation.		5/84			EPA
R. Develop SIP as necessary pending promulgation of National Ambient Air Quality Standards.	As Required				
S. Develop visibility SIP for protection of Class I Areas within 9 months of promulgation.	As Required				
TOTALS			29.00	4.30	

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
I. Water Pollution Control					
A. Administration					
1. Provide general program direction and supervision and development of staffing and budget needs.			.70		WQB
2. Administrative support.			2.00		WQB
3. General policy guidance and periodic review of program outputs.			.10	.15	WQB, EPA
B. Wastewater Discharge Permit Program					
1. Issue, reissue or modify major permits ensuring that water quality standards are met, toxic criteria limitations and pretreatment requirements are imposed, residual wastes are handled adequately and appropriate effluent limitations and self-monitoring are provided.	6	12	1.40	.30	WQB, EPA
2. Issue, reissue or modify minor permits or general permits as needed.	45	90	1.70	.10	WQB, EPA
3. Provide sampling or evaluation inspections on all major discharges.					

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ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
a. Inspections will be completed on 18 major industrial permittees at least twice using Form 3560-3. Of the 36 inspections 18 of them will be sampling inspections. Ten major municipal permittees will receive sampling inspections. Approximately 10 minor dischargers will receive sampling inspections.	20	56	.70		WQB
b. Provide audit and evaluation inspections. Fifteen facilities, including those on Indian reservations will receive evaluation inspections from EPA.	5	15		.10	EPA
4. Provide appropriate enforcement actions.					
a. Violations which are continuing and causing damage to an existing beneficial use will be given prompt attention.					
b. Violations by major dischargers with discharges of toxic materials will be given high priority.			.90		WQB
c. Other violators will be handled as time allows.	As Needed	As Needed		.55	EPA-Montana & Denver
d. State will be informed of EPA enforcement activities.					EPA
e. EPA will initiate necessary followup actions against those permittees where the state action is not adequate to meet the requirements of the Clean Water Act.	As Needed	As Needed	.10		FPA- Montana & Denver

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
5. Provide review and appropriate notification on self-monitoring information as reports are received. EPA-Helena reviews self-monitoring reports for Indian reservation facilities for which responsibility has not been delegated.	Date of Completion: Ongoing	Ongoing	.50	.10	WQB, EPA
6. EPA 309(a) Notice of Violations (NOVs).	As Appropriate			.10	EPA
a. EPA summary of outstanding 309(a) NOVs.	6	12		.10	EPA
b. State response on outstanding 309(a) NOVs.	6	12	.10		WQB
7. Quarterly Noncompliance Reports.	2	4	.20		WQB
8. Reconnaissance inspections. Estimated number = 75.	30	75	.50		WQB, EPA
9. Conduct applicable elements of the pretreatment program in accordance with final guidelines.			.10	.05	WQB, EPA
10. Investigate complaints of illegal discharges and possible violations of water quality standards and provide follow-up.	Ongoing	Ongoing	.60	.10	WQB, EPA
11. Provide coordination between permits/enforcement program and construction grant program to improve municipal facility compliance.	Ongoing	Ongoing	.20	.05	WQB, EPA
12. Provide copies of all file documentation for major and designated minor permits to Montana Office.	As Required	As Required	.10	.05	EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
13. Follow up on the most significant problems identified through the DMR QA program. The results of this program will be utilized as a tool in selecting inspection candidates.			.05		WQB
14. State program overview, policies, procedures and output reviews.		Ongoing		.10	EPA, WQB
C. Groundwater (excludes UIC)					
1. Implement groundwater pollution control program in accordance with adopted regulations.			.50		WQB
2. Investigate complaints of groundwater pollution and provide recommendations. Provide enforcement when needed.			.20		WQB
3. Monitor groundwater problems and obtain groundwater samples for analyses.			.20		WQB
D. Dredge and Fill					
1. Issue 3(a) authorizations for short-term activities which exceed turbidity standards.					
a. 3(a) authorizations issued.	35	70	.30		WQB
2. Review and issue certifications to Section 404 permits.			.20		EPA-Denver
a. Certification issued.	15	30			

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
b. Waive certifications where adequate review provided by other agencies.	25	50			
3. Coordinate program with Corps of Engineers, EPA, Department of Fish, Wildlife and Parks, and Conservation Districts.			.10		WQB
4. Inspect operations.					
a. Preconstruction investigations.	5	10	.10		WQB
b. During construction investigations.	5	10	.10		WQB
E. Water Quality Standards					
1. Identify water quality standards revisions for priority waterbodies by coordination with permits and construction grants staff.		Ongoing			WQB
2. EPA will review and comment on State identified priority waterbodies for water quality standards review.		Ongoing			EPA
3. State will initiate studies (site specific criteria, use attainability, WLAs etc.) as necessary. WQS revisions.		Ongoing			WQB
4. State will revise WQS as necessary based upon State studies.		Ongoing			WQB
5. State will submit revisions to EPA.		Ongoing			WQB
6. EPA will review and approve/disapprove State WQS.		As Needed			EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
F. Operation and Maintenance					
1. Inspections.					
a. Discharging facilities.			.50		WQB
b. Nondischarging facilities.			.20		WQB
c. Special assistance.			.20	.20	WQB, EPA
2. Operator Training.					
a. Annual school.		1	.05		WQB
b. Special seminars.		6	.10		
3. Big Sky Clearwater.					WQB
4. Monitor 104(g)(1) grants (METCO, Northern Montana College, FY 83 Funds).				.02	WQB
G. Fixed-Station Monitoring					WQB USGS
Seven USGS NASQAN stations have been designated as the core of the State's ambient monitoring network:			.01		EWP
Clark Fork River below Missoula Flathead River at Flathead, B.C. Milk River at Nashua Missouri River at Toston Tongue River at Miles City Yellowstone River near Livingston Yellowstone River at Billings		Ongoing			WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
One additional station will be monitored monthly:	Date of Completion		.04		WQB
Clark Fork River at Deer Lodge					
(Also see Item III. A. Monitoring performed under 205(j) workplan.)					
H. Biological Monitoring					WQB
1. Prepare summary of findings to date and determine statistical needs and confidence limits for trend analysis.			.20		
I. Wasteload Allocation/Totsl Maximum Daily Loads					
1. The State will perform WLA's as required for impending permit issuances and construction grants, decisions (e.g., NH_3 at Kalispell, Phosphorus in Flathead Basin).		Ongoing			WQB
2. The State will schedule monitoring and data collection efforts needed in support of WLA's.		Ongoing			WQB
3. The State will develop WLA's.		Ongoing			WQB
4. EPA will review the WLA during the permit proposal process.		Ongoing			EPA
5. The State will incorporate the WLA's into the WQS.		Ongoing			WQB

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
J. Maintain approved quality assurance program.			.01	.20	WQB, EPA
K. Maintain data management program.			.25	.23	WQB, EPA
1. Keep data files up to date.					
2. Continue editing of data files.					
3. Make periodic entries into STORET.					
4. Explore alternative data management systems.					
5. Process water quality data as submitted by the State into STORET.				.10	
6. Prepare water quality trends report--1983 data.					
7. Conduct Basic STORET Seminar.	2/84			.10	EPA
TOTALS			13.21	2.88	

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	FPA	
	Date of Completion				
II. Drinking Water Program					
A. Administer program according to the Federal SDWA, State statutes and regulations, and grant regulations and conditions.			1.10		
1. Provide an annual report to EPA within 90 days of the end of the fiscal year in the format requested by EPA.		1			WQB
2. Participate in program evaluations performed by EPA.		1			WQB
3. Administer local health department contracts for inspections of public water supplies.		21			WQB
B. PWS surveillance and technical assistance.			2.10		
1. Conduct inspections of PWS's and make written reports.					
a. WQB staff.		255			WQB
b. Contracted sanitarians.		800			WQB
c. Contracted individual(s).		400			WQB
2. Investigate suspected waterborne disease outbreaks.		By Incident			WQB
3. Investigate suspected incidences of underground sources of drinking water contamination.		By Incident			WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
C. Review plans and specifications for all new and/or modified PWS's.		100	1.50		WOB
D. Train and certify water system program personnel. *One 1-week course 10 Day Seminars 2 Certification Tests Given		*	.80		WOB
E. Enforce program regulations.			1.50		WOB
1. Monitor compliance of each PWS with program regulations.		2,014			
2. Assure that MCL violations are being corrected.					
3. Advise PWS's to give effective public notification of violations.					
4. Reduce the number of persistent bacteriological monitoring violations by 50 percent (based on FY82 violation data).		7% persistent violation rate			
F. Maintain records essential for PWS program including inventory of all PWS's.		2,014	1.50		WOB
G. Provide laboratory capability to conduct analysis necessary for the program.					WOB
1. Recertify private microbiological laboratories to which PWS's submit samples for required analyses.		5			Lab
2. Bacteriological samples.		10,000			Lab

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
3. Inorganic chemical samples.	Date of Completion	230			Lab
4. Organic chemical samples		20			Lab
5. Trihalomethane samples.		24			Lab
6. Radiological samples.		100			Lab
7. Nitrate only samples.		400			Lab
II. Underground Injection Control (UIC)					
1. Administer program according to the Federal Safe Drinking Water Act.				.70	
a. Inventory Update Classes I, II, III, & IV.	12/31/83				EPA
b. Inventory Class V.		9/30/84			EPA
c. Quarterly Noncompliance Report (122.18(a)).	11/30/83 2/28/84	5/31/84 8/31/84			EPA
d. Annual Noncompliance Report (122.18(c)).	12/31/83				EPA
e. Annual Program Report (122.18(c)).	12/31/83				EPA
f. Data Management.					EPA-Denver

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
2. Permit approval.					
a. Permits issued.		40		3.00	EPA-Montana & Denver
3. Aquifer Exemption.					
a. Submission of proposal to Exempt Aquifers (122.35).	12/31/83			.30	EPA-Montana & Denver
4. Surveillance and Investigation (35.670-4(a)).				1.00	EPA
a. Mechanical integrity tests witnessed.	25				EPA
b. Mechanical integrity tests performed.	100				EPA
c. Compliance reports reviewed.					
TOTALS			8.50	5.00	

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
III. Water Quality Management					
A. Water Quality Management Workplans					
1. Discuss current priority basin programs/needs with EPA and local agencies involved with water quality planning.		Ongoing			WQB
2. Conduct activities described in the 205(j) workplan submitted in March 1983.					WQB
a. Complete loading of Forest Service, Indian 208, Areawide 208 data into STORET for problem stream segments.	10/83		.10		WQB
b. Conducts monitoring on Clark Fork River.			.30		WQB
c. Finalize 1984 305(b) Guidance.	10/83				EPA
d. Incorporate monitoring results at Clark Fork River, Warm Springs and Garrison stations in 1984 305(b) report.		4/84	.05		WQB
e. Conducts stream recovery/WWTP upgrade studies.			.80		WQB
f. Incorporate preliminary results of East Gallatin River recovery in 1984 305(b) report.		4/84	.05		WQB
g. Prepare draft Management Plan for Freezeout Lake/Priest Butte Lake/Teton River.	12/83		.10		WQB
h. Review draft Management Plan for Freezeout Lake/Priest Butte Lake/Teton River.	1/84				EPA

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
i. Finalize 1984 305(b) Guidance.	10/83				EPA
j. Finalize and implement Management Plan for Freezeout Lake/Priest Butte Lake/Teton River.		6/84	.10		WQB
k. Monitor water development activities on the Yellowstone River to ensure no interference with DNES Yellowstone instream flow reservation. Include summary of water development activities in 1984 305(b) report.		Ongoing	.25		WQB
l. Assemble and submit data to EPA for computer analysis for 305(b) priority list.		11/84	.10		WQB
m. Complete computerized data analysis for the 1984 305(b) report.	2/84				EPA
n. Assist generally with timely completion of 1984 305(b) report.		4/84		.10	EPA
o. Prepare and submit copy of 1984 305(b) report to EPA, including priority waterbody list.		4/84	.20		WQB
p. Develop computerized biological water quality data storage and retrieval system on schedule with 205(j) workplan.			.50		WQB
q. Carry out Prickly Pear Creek stream corridor management plan in accordance with 205(j) workplan. Complete final report.		4/84	.10		Lewis&Clark Co. & Jeff. Valley CDs Streamworks WQB

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	WORKYEARS EPA	
	Date of Completion				
r. Include agricultural nonpoint source water quality improvement success stories in the 1984 305(b) report.		4/84	.05		WQB
s. Identify agricultural-related water quality problems and help facilitate development and implementation of solutions.		Ongoing	.65		WQB
t. Maintain general water quality management program in accordance with 205(j) workplan.		Ongoing	1.05		WQB
u. Provide guidance and general assistance as necessary to implement 205(j) workplan activities.		Ongoing		.10	EPA
3. EPA reviews progress and assists as necessary with implementation of 205(j) workplan activities.				.20	EPA
4. Review and amend existing 205(j) workplan activities and concepts.		Ongoing	.05		WQB
5. Review and comment upon draft State 205(j) workplan amendments, and concur on final amendments.		Ongoing		.05	EPA
6. Prepare application for remaining FY 1983 and for FY 1984 205(j) funds.		5/84	.05		WQB
7. EPA acts upon State 205(j) application within 60 days.				.05	EPA

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
B. CPP - Review, Update and Use					
1. EPA reviews CPP requirements relative to existing State documents and provides clear guidance to the State regarding necessary revisions, additions, clarifications, cross referencing, etc., which may be necessary to comply with CPP requirements.	10/83			.05	EPA
2. Review CPP requirements and guidance and updates CPP as necessary.	3/84		.05		WQB
3. Approve/disapprove revised CPP.		5/84		.05	EPA
C. WQM Plans - Update/Recertify				.10	EPA
1. State, EPA and remaining designated Areawide agencies review planning jurisdictions and dedesignate Areawides if appropriate.	12/83		.05		EPA, WQB
2. Review WQM Plan recertification procedures.	1/84		.05		EPA, WQB
3. Update/recertify State WQM Plan and monitor and evaluate progress of management agencies.		9/84	.10		WQB
4. Approve/disapprove recertified updated plans.					EPA
TOTALS			4.75	0.70	

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
IV. Construction Grants					WOB, EPA
A. Participate in Regional Construction Grants Oversight/Office of Water Accountability Systems.					WOB, EPA
1. Submit detailed workplan containing core elements of the program including quantitative estimates of performance per Regional Construction Grants Oversight System. (Date to be set by Regional Office in accordance with HQ Schedule.)					WOB
2. Manage the program in a best effort attempt to accomplish the estimated performance indicators. Monitor progress in these areas and participate in quarterly reviews.					WOB, EPA
V. Water and Wastewater Operator Certification					
A. Issue certification licenses to operators and give examinations to new operators.			.50		WOB/ Water & Wastewater Certification Board
1. Licenses issued.		800			
2. Exams given.		200			
TOTALS			.50		

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	FPA	
	Date of Completion				
VI. Laboratory Support					
A. Provide certification by performing evaluations of laboratories which propose to do analyses which will be submitted for compliance with State regulations. Labs certified include:	Ongoing		.50		
1. Bacteriological laboratories.		14			
2. Chemical laboratories.		10			
B. Provide laboratory facilities with the capability to do analyses as required by the State regulations. The types of sample which the State Laboratory will analyze are:					
1. Bacteriological samples.		5,500			
2. Inorganic chemical samples.		275			
3. Organic chemical samples.		10			
C. Conduct performance audit inspections at selected MPDES facilities.		3			WQB, FPA
TOTALS			.50		

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
I. Develop Hazardous Waste Regulatory Program which qualifies for full EPA authorization.					
A. Develop and promulgate regulations equivalent to RCRA 40 CFR 260-267 as needed.	Ongoing		.30		SWMB
B. Submit official application to EPA.	10/83		.30		SWMB
C. Participate in EPA public hearing and public notice process.	2/84		.10	.10	SWMB, EPA
D. Develop and provide program reports and participate in periodic program review as per the authorization package Memorandum of Agreement.	Quarterly		.30	.10	SWMB
E. Develop and promulgate specific regulations for the control of small quantity hazardous wastes per 40 CFR 261.5.	Ongoing		.30	.10	SWMB
F. Assume full responsibility for Hazardous Waste Management Program.		4/84			SWMB
G. Update State Quality Assurance Project Plan for hazardous waste per 40 CFR 271.		9/84	.50		SWMB
H. Evaluate and report on State Quality Assurance Project Plan and activities.		9/84		.10	EPA

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
II. Implement Hazardous Waste Regulatory Program as outlined in the authorization Memorandum of Agreement.					
A. Review and update notification data, investigate non-notifiers and inspect when necessary.	Ongoing		.05	.05	SWMB, FPA
B. Inspect generators and transporters for compliance with applicable standards.			.25	.10	SWMB, FPA
C. Receive and review manifest exception reports.	As Needed		.10	.10	SWMB, EPA
D. Review agreements with State transportation authorities for needed revisions.			.05	.05	SWMB, FPA
E. Inspect TSD facilities for compliance with applicable standards.					SWMB, FPA
1. Permitted facilities.			.20	.05	
2. Interim status standards facilities.			.55	.15	
F. Implement Hazardous Waste Facility Permit Program.		4/84			SWMB, FPA
1. Continue permitting functions under Cooperative Agreement.	10/83		.05	1.00	
2. Assume responsibility for permit issuance for facilities which EPA has requested Part B applications upon full authorization.		4/84			

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
a. Request Part B permit applications.			.10		
b. Review complete applications.			.50	.10	
c. Draft permit conditions.			.50	.10	
d. Issue public notice or proposed permit.			.20		
e. Issue final permit.			.20		
G. Document noncompliance and initiate appropriate enforcement action for violations of generation, transporter and TSD facility standards.	As Needed		.75	.50	SWMB, EPA
H. Conduct follow-up inspections as necessary on enforcement actions.	As Needed		.10	.10	SWMB, EPA
I. Report to EPA on authorized program progress as per Memorandum of Agreement until full authorization received.	Semiannual		.10		SWMB, EPA
J. Regulate small quantity generation and management of hazardous wastes.	Ongoing		.50	.10	SWMB, EPA
K. Give technical assistance to local government and industry on hazardous wastes.	Ongoing		.30	.30	SWMB, EPA
TOTAL			6.75	3.10	

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	FPA	
	Date of Completion				
III. Implement Requirements of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (Superfund)					
A. Investigate sources of release and threats of possible release of hazardous substances.					
1. Perform field investigation of CERCLA notifiers (RCRA Subsection 3012 Grant).			1.00	.20	SWMB, FPA
2. Direct Field Investigation Team (FIT) activities.			.05	1.80	EPA
a. Anaconda Smelter.					
b. ASARCO East Helena.					
c. New sites (as identified).					
3. Develop submissions for National Priorities List (NPL).			.05	.10	DHES, FPA
B. Review and make funding determinations for Superfund actions to control releases when responsible party fails to provide proper response.			.10	.10	DHES, FPA
C. Implement existing Cooperative Agreements for Remedial Investigations/Feasibility Studies/ Initial Remedial Measures at specific sites.					
1. Milltown.			.65	.25	SWMB
2. Silver Bow Creek.			1.05	.25	SWMB, WQB

HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	FPA	
	Date of Completion				
D. Monitor enforcement/remedial activities at sites where responsible parties undertake cleanup activities.			.10	1.80	FPA, SWMB
1. Anaconda Refinery.					
2. Rocky Mountain Phosphate.					
3. Libby.					
4. New sites (as identified).					
TOTALS			3.00	4.50	
IV. Maintain Solid Waste Management Program	Ongoing				
A. Inspection and enforcement.					
1. Continued maintenance of a waste management inspection program.					
2. Prepare and initiate enforcement actions where violations of license conditions have occurred.					
3. Follow-up inspections where enforcement action has taken place.					

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE					WORK YEARS	
	MIDYEAR		END-OF-YEAR				
	GRANT EPA	PRIMACY STATE	GRANT EPA	PRIMACY STATE	TOTAL	FEDERAL GRANT	PRIMACY STATE
I. Maintain the Field Pesticide Enforcement Program							
A. Conduct use/misuse/accident/ complaint inspections (as needed).	20	33	30	91	174	0.63	1.79
B. Conduct applicator inspections (certification/records).	84	300	103	78	565	0.29	0.97
C. Conduct dealer inspections (certification/records).	89	239	52	48	428	0.24	0.69
D. Conduct market place inspections (label reviews product registration surveillance of cancelled/suspended products).	80	200	53	82	415	0.25	0.68
E. Conduct inspections for compliance with storage and disposal of hazard waste pesticides (applicators, dealers, private applicators, homeowners).	10	127	13	50	200	0.09	0.68
F. Conduct producer establishment inspections (includes Label Improvement Programs (LIP) and the Child Resistant Packaging (CRP) program).	3				3	0.10	

GRANT - EPA and State Matching Funding.

PRIMACY - State Funding.

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE					WORK YEARS	
	MIDYEAR		END-OF-YEAR				
	GRANT EPA	PRIMACY STATE	GRANT EPA	PRIMACY STATE	TOTAL	FEDERAL GRANT	PRIMACY STATE
G. Collect producer establishment samples (formulations).	45				45	0.11	
H. Collect marketplace samples (formulations).	21	184			205	0.02	0.18
I. Collect complaint/damage case samples.					As Needed 450		0.30
J. Other activities. - Imports, recalls, cancellation/ suspension - Embargoes - Monitor EUP's - Monitor 24(c)'s - Monitor Section 18's					As Needed	0.05	0.20
II. Maintain the Administrative Enforcement Case/Compliance Program.							
A. Provide staff training.					As Needed	0.02	0.06
B. Conduct compliance training for applicators/dealers.					30 Sessions		0.30
C. Prepare, issue compliance orders, prosecute cases.					As Needed	0.02	0.05

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE					WORK YEARS	
	MIDYEAR		END-OF-YEAR				
	GRANT EPA	PRIMACY STATE	GRANT EPA	PRIMACY STATE	TOTAL	FEDERAL GRANT	PRIMACY STATE
D. Review dealer restricted use sales records for violation of 12 (a) (2) (f).	140	560	140	560	1,400	0.10	0.40
E. Monitor applicator records for certification compliance.	240	960	240	960	2,400	0.10	0.40
F. Monitor records for pesticide registration requirements.	80	320	80	320	800	0.05	0.05
G. Monitor compliance with administrative/ enforcement orders.					As Needed		0.10
III. Maintain Laboratory Operations							
A. Analyze formulation samples; number analysis required.	113		159	378	250 650	0.92	0.77
B. Analyze residue samples; number analysis required.	100		500	750	450 1,350	1.42	1.32
C. Analyze quality control samples/ method development; number analysis required.			150	150	N/A 300	0.31	0.31
D. Maintain quality assurance program for laboratory.					As Needed	0.10	0.10

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE					WORK YEARS	
	MIDYEAR		END-OF-YEAR				
	GRANT EPA	PRIMACY STATE	GRANT EPA	PRIMACY STATE	TOTAL	FEDERAL GRANT	PRIMACY STATE
IV. Maintain the established Pesticide Applicator Certification and Training Programs.							
A. Maintain the computer programs for issuing applicator and dealer, private applicator certification credentials.					3,300 Credentials	0.40	0.40
B. Provide initial and certification/ recertification training for applicator and dealer, private applicator.					1,800 People	0.10	0.20
TOTAL WORK YEARS						5.50	10.40
V. EPA Review/Evaluation.							
A. Submit midyear and year end grant reports.							
B. EPA to submit audit report at year end.							

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	WORKYEARS EPA	
I. Toxic Substances	Date of Completion				
A. Protect health and well being of school children attending schools that contain friable asbestos-containing materials.					
1. Provide assistance and technical advice to school district administrators in complying with the asbestos rule.				.05	EPA
2. Inspect school districts for compliance with asbestos program requirements.	10	20		.20	EPA
B. Ensure mutual information exchange regarding significant toxics activities.				.05	EPA
1. Provide quarterly list of inspections performed.	2	4			EPA
2. Notify State of cases filed by EPA within 4 days of the action.					EPA
3. Consult with State on methods of dealing with PCB users both from a consulting and an enforcement viewpoint.					EPA
C. Report within thirty (30) days incidents involving chemical contamination.					DHES, DOA EPA
D. Implement PCB work plan.					EPA
1. Inspect facilities which store or use PCB-containing materials.	10	30		.20	

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
2. Prepare any technical documentation in support of enforcement actions for violations found during inspections within forty-five (45) days.				.10	EPA
E. Develop an information exchange to provide human health related data on environmental control activities and pollution incidents.	Ongoing				
TOTALS				.60	

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
II. Indian Activities					
A. Air Programs					
1. Assist tribes with ongoing programs.				.25	EPA
a. Northern Cheyenne.					
b. Fort Peck.					
c. Flathead.					
d. Fort Belknap.					
e. Crow.					
B. Solid Waste					
1. Provide technical assistance to tribes.	1	2			EPA
C. Pesticides					
1. Assist Fort Belknap Tribes in implementing certification program.				.10	EPA
D. Complete review of State and Tribal WQM activities.			.02		WQB
TOTALS			.02	.35	

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
III. Flathead Basin Commission					
Serve as EPA representative on Flathead Basin Committee.	4 meetings per year			.05	FPA
TOTAL				.05	
IV. Federal Agency FIS Review					
A. Impact Federal agencies (BLM, FS, BPA, USGS, OSM) to gain environmentally acceptable energy development, grazing and timber projects.					
B. Impact various Federal agencies to gain environmentally acceptable projects.					
1. Pre-EIS consultation/EIS review of Forest Service Management Plans.				.10	FPA
2. Pre-EIS consultation/EIS review of BLM grazing plans, energy area land use plans, and other land use plans.				.05	FPA
3. Pre-EIS consultation/EIS review of highway plans, airport plans, etc.				.10	FPA
4. Pre-EIS consultation/EIS review of water development projects.				.10	FPA
TOTAL				.35	

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	WORKYEARS EPA	
	Date of Completion				
V. Quality Assurance Programs					
A. All Media					
1. Review State QA documentation annually.		9/30/84		.10	EPA/QAO
2. Provide reference samples one month after the request is received in Cincinnati.					EPA/CI
3. Support State's quality assurance activities and provide assistance as necessary.				.10	EPA/QAO MT
4. Submit annual Quality Assurance Report.			.05	.10	DHES
5. Submit QA program plans with grant applications.					State
6. Evaluate and approve submitted QA program plans.		30 Days From Receipt		.10	EPA/QAO
TOTALS			.05	.40	

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
VI. Emergency Response					
A. Immediate removal action in response to releases or substantial threats of releases of hazardous substances.					
1. Upon request by the State provide Federal on-scene coordinator (OSC) to monitor responsible party action for all severe releases requiring immediate removal.	Ongoing			.10	EPA
2. Upon request by the State provide funding (if available) and OSC for immediate removal of releases when responsible party fails to provide proper response.	Ongoing			.10	EPA
3. Carry out all State responsibilities under the State Environmental Emergency Response Plan and provide State OSC to monitor responsible party action for releases where Federal OSC not required.	Ongoing		.10		State
B. Response to oil spills entering or threatening surface waters.					
1. Provide funding (if available) and direct cleanup of all spills when responsible party fails to properly respond.	Ongoing		.05	.10	EPA, State
2. Provide OSC for all major and selected medium spills to monitor response by responsible party.	Ongoing		.05	.10	EPA, State

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	FPA	
	Date of Completion				
3. Provide OSC for selected medium and all minor (when necessary) spills and carry out responsibilities under State Contingency Plans.	Ongoing		.10		State
C. Contingency Planning					
1. Update Region VIII Oil and Hazardous Substances Pollution Contingency Plan.	6/84			.10	EPA
2. Update State Environmental Emergency Response Plan.	As Needed		.10		State
D. Training of State and Local Emergency Response Personnel					
1. Ensure adequate safety training provided to State personnel responding to hazardous material emergencies.	Ongoing		.03		WQB
TOTALS			.43	.50	

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